

April 5, 2021

Attn: Regional Freedom of Information Officer
U.S. EPA, Region 2
290 Broadway, 26th Floor
New York, NY 10007-1866
(212) 637-3668

Attn: National FOIA Office
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2310A)
Washington, DC 20460

cc: Staley Prom, Esq., sprom@surfrider.org

Re: Freedom of Information Act (“FOIA”) Request, re Finca Sueño de Aurora’s Stormwater Pollution Prevent Plan.

Dear FOIA officer,

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552 *et seq.* and FOIA regulations at 40 C.F.R. Part 2, Surfrider Foundation requests the following documents from the United States Environmental Protection Agency (“EPA”) relating to project Finca Sueño de Aurora, National Pollutant Discharge Elimination System (“NPDES”) ID Number PRR1000A9:

1. Copies of all draft and final Stormwater Pollution Prevention Plans and attachments thereto provided by Bellagio Corp, c/o Jorge Vaz, for development project “Finca Sueño de Aurora” at PR-413 Km. 1.3 (Int.), Ensenada Ward Rincon, Puerto Rico.

A Notice of Intent (“NOI”) for a NPDES Construction Permit (NPDES ID: PRR1000A9; OMB Approved No. 2040-0004) filed with the EPA indicates that a Stormwater Pollution Prevention Plan has been prepared in connection with that NOI.

Surfrider requests that all fees be waived under U.S.C. §552(a)(4)(A)(iii) and 40 C.F.R. §2.107(l), as this request is not for commercial purposes and is in the public interest. The Surfrider Foundation is a non-profit organization dedicated to the mission of the protection and enjoyment of our ocean, waves, and beaches. One of our core initiatives is the protection of water quality, for all beneficial purposes including recreation. This request relates to improving Surfrider members’ and the public’s understanding of issues related to stormwater pollution

around the Tres Palmas Marine Reserve, including the operations of government permitting agencies.

Surfrider requests these documents within 20 working days, pursuant to 5 U.S.C. § 552(a)(6) and 40 C.F.R. § 2.104. Additionally, Surfrider requests these documents be provided in electronic format, emailed to sprom@surfrider.org. If this means is unavailable, please instruct where and how the documents can be promptly delivered.

Sincerely,

A handwritten signature in black ink, appearing to be 'CV' with a stylized flourish.

Christina Vieira da Rosa

Legal Intern

Surfrider Foundation

christinavieiradarosa@gmail.com